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October 2, 2023

VIA ECF

Honorable Robert Kugler, U.S.D.J.
U.S. District Court - District of N.J.
Mitchell S. Cohen Building &
U.S. Courthouse
1 John F. Gerry Plaza, Courtroom 4D
4th and Cooper Streets
Camden, New Jersey 08101

Honorable Thomas I. Vanaskie (Ret.)
Special Master
Stevens & Lee
1500 Market St., East Tower,
Suite 1800
Philadelphia, Pennsylvania 19103

Re: ***In re Valsartan, Losartan, and Irbesartan Liability Litigation,***
Case No. 1:19-md-02875-RBK (D.N.J.)

Dear Judge Kugler and Judge Vanaskie:

Please accept this letter on behalf of Plaintiffs in advance of the October 4, 2023 case management conference.

1. Update on Torrent's Losartan and Irbesartan Discovery.

Plaintiffs and Torrent have reached an agreement regarding discovery end dates for custodial productions. The Parties have agreed to an end date of May 22,

Honorable Robert Kugler, U.S.D.J.
Honorable Thomas I. Vanaskie (Ret.)
October 2, 2023
Page 2

2023, for the newly identified custodians and the following custodians previously identified during valsartan discovery:

1. Sushil Jaiswal
2. Dilkesh Shah
3. Reddy Neravetla
4. Jocelyn Rivera

Torrent will search the remaining custodial files identified during valsartan discovery through the original date of collection, which ranges from March to May 2020.

2. PFS Deficiencies and Orders to Show Cause.

Plaintiffs will be prepared to address this issue during the conference.

Respectfully,



ADAM M. SLATER

Cc: All counsel of record (via ECF)